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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TITAN INTERNATIONAL
TECHNOLOGIES, LTD.,

Plaintiff,

v.

COBRA FIRING SYSTEMS, LLC and
PHANTOM FIREWORKS OF PAHRUMP,

Defendants.

Case No.: 2:24-cv-861

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT**

[FIRST REQUEST]

Plaintiff Titan International Technologies, LTD. (“Titan”), by and through its counsel of record, and Defendants COBRA Firing Systems, LLC (“Cobra”) and Phantom Fireworks of Pahrump (“Phantom”) (collectively “Defendants”), by and through their counsel of record, pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate to extend the time to respond to Titan’s Complaint (ECF No. 1) by forty-five (45) days, through and including **July 15, 2024**.

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1 This extension is requested so the parties can further evaluate and discuss the potential for
2 resolution. This request is not for purposes of delay.

3 DATED this 28th day of May, 2024.

DATED this 28th day of May, 2024.

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5 By: /s/ Dustun H. Holmes
6 Dustun H. Holmes, Bar #12776
7 MCMENEMY | HOLMES PLLC
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By: /s/ Ajit Vaidya, Esq.
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Attorneys for Defendants

11 *Attorneys for Plaintiff*

12 **IT IS SO ORDERED:**

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: 5/29/2024
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